

EXHIBIT 12

RBDS	DISPLAY TECHNOLOGIES	PAM	ROTHSCHILD	SAMUEL MEYLER & MEYLER LEGAL PLLC
<p>REQUEST NO. 3: All Documents, Communications, and Things Relating to Your identification of third parties to send Demand Letters to, and Your decision Relating to which patents to include in those Demand Letters.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 3: All Documents, Communications, and Things Relating to Your identification of third parties to send Demand Letters to, and Your decision Relating to which patents to include in those Demand Letters.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 5: All Documents, Communications, and Things Relating to Your identification of third parties to send Demand Letters to, and Your decision Relating to which patents to include in those Demand Letters.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 3: All Documents, Communications, and Things Relating to Your identification of third parties to send Demand Letters to, and Your decision Relating to which patents to include in those Demand Letters.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 3: All Documents, Communications, and Things Relating to Your identification of third parties to send Demand Letters to, and Your decision Relating to which patents to include in those Demand Letters.</p> <p>RESPONSE:</p> <p>Defendants expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>

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<p>and/or parties involved in this case.</p> <p>Defendant also objects to this Request as vague and ambiguous as to the scope and use of the term “decision.”</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>and/or parties involved in this case.</p> <p>Defendant also objects to this Request as vague and ambiguous as to the scope and use of the term “decision.”</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>and/or parties involved in this case.</p> <p>Defendant also objects to this Request as vague and ambiguous as to the scope and use of the term “decision.”</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>and/or parties involved in this case.</p> <p>Defendant also objects to this Request as vague and ambiguous as to the scope and use of the term “decision.”</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Defendants also object to this Request as vague and ambiguous as to the scope and use of the term “decision.”</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>
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<p>REQUEST NO. 10: Documents sufficient to identify all recipients of Demand Letters where the recipients already had a License agreement with You.</p> <p>RESPONSE: Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>REQUEST NO. 10: Documents sufficient to identify all recipients of Demand Letters where the recipients already had a License agreement with You.</p> <p>RESPONSE: Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>REQUEST NO. 13: Documents sufficient to identify all recipients of Demand Letters where the recipients already had a License agreement with You.</p> <p>RESPONSE: Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>REQUEST NO. 10: Documents sufficient to identify all recipients of Demand Letters where the recipients already had a License agreement with You.</p> <p>RESPONSE: Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>REQUEST NO. 8: Documents sufficient to identify all recipients of Demand Letters where the recipients already had a License agreement with You.</p> <p>RESPONSE: Defendants expressly incorporate each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendants also object to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>

other Requests or other discovery already available to Plaintiff.	other Requests or other discovery already available to Plaintiff.	other Requests or other discovery already available to Plaintiff.	other Requests or other discovery already available to Plaintiff.	other Requests or other discovery already available to Plaintiff.
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<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>
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<p>REQUEST NO. 28: Specific to the '221 Patent, all Documents, Communications, and Things that Relating to whether You have “[d]emonstrated reasonable business practices in previous efforts to enforce the [’221] patent” or “[s]uccessfully enforced the [’221] patent, or a substantially similar patent.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>		<p>REQUEST NO. 44: Specific to the '221 Patent, all Documents, Communications, and Things that Relating to whether You have “[d]emonstrated reasonable business practices in previous efforts to enforce the [’221] patent” or “[s]uccessfully enforced the [’221] patent, or a substantially similar patent.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 34: Specific to the '221 Patent, all Documents, Communications, and Things that Relating to whether You have “[d]emonstrated reasonable business practices in previous efforts to enforce the [’221] patent” or “[s]uccessfully enforced the [’221] patent, or a substantially similar patent.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 33: Specific to the '221 Patent, all Documents, Communications, and Things that Relating to whether You have “[d]emonstrated reasonable business practices in previous efforts to enforce the [’221] patent” or “[s]uccessfully enforced the [’221] patent, or a substantially similar patent.</p> <p>RESPONSE:</p> <p>Defendants expressly incorporate each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>
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<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p>		<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p>	<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p>	<p>other applicable privilege or immunity.</p> <p>Defendants also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendants.</p> <p>Defendants also object to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendants also object to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendants will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p>
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<p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks “[a]ll Documents, Communications and Things” without limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party’s claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection</p>		<p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks “[a]ll Documents, Communications and Things” without limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party’s claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection</p>	<p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks “[a]ll Documents, Communications and Things” without limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party’s claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection</p>	<p>Defendants also object to this Request as overly broad and unduly burdensome to the extent that it seeks “[a]ll Documents, Communications and Things” without limitation or qualification. Defendants also object to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party’s claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or</p>
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at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.		at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.	at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.	make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.
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<p>REQUEST NO. 2: All Documents, Communications, and Things Relating to any Demand Letter You sent to an Entity headquartered, registered, or otherwise located in Washington state, including any attachments or infringement charts (i.e., claim charts), and any responses and subsequent Communications Relating thereto.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 2: All Documents, Communications, and Things Relating to any Demand Letter You sent to an Entity headquartered, registered, or otherwise located in Washington state, including any attachments or infringement charts (i.e., claim charts), and any responses and subsequent Communications Relating thereto.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 4: All Documents, Communications, and Things Relating to any Demand Letter You, another Defendant, or a Related Company sent to an Entity headquartered, registered, or otherwise located in Washington state, including any attachments or infringement charts (i.e., claim charts), and any responses and subsequent Communications Relating thereto.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client</p>	<p>REQUEST NO. 2: All Documents, Communications, and Things Relating to any Demand Letter You sent to an Entity headquartered, registered, or otherwise located in Washington state, including any attachments or infringement charts (i.e., claim charts), and any responses and subsequent Communications Relating thereto.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 2: All Documents, Communications, and Things Relating to any Demand Letter You sent to an Entity headquartered, registered, or otherwise located in Washington state, including any attachments or infringement charts (i.e., claim charts), and any responses and subsequent Communications Relating thereto.</p> <p>RESPONSE:</p> <p>Defendants expressly incorporate each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>
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<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>	<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>	<p>privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p>	<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>	<p>other applicable privilege or immunity.</p> <p>Defendants also object to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendants also object to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendants also object to this Request to the extent it calls for documents not within the possession, custody, or control of Defendants.</p>
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Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" relating to "any Demand Letter" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues	Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" relating to "any Demand Letter" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues	Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" relating to "any Demand Letter" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it	Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" relating to "any Demand Letter" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues	Defendants also object to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" relating to "any Demand Letter" without further limitation or qualification. Defendants also object to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or

<p>and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant has no responsive, relevant, non-privileged documents in its possession, custody, or control.</p>	<p>and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant has no responsive, relevant, non-privileged documents in its possession, custody, or control.</p>	<p>seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Defendant also objects this request as overly broad and unduly burdensome to the extent it calls for information or documents not within the possession, custody, or control of Defendant.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant has no responsive, relevant, non-privileged documents in its possession, custody, or control.</p>	<p>and/or parties involved in this case.</p> <p>Defendant also objects this request as overly broad and unduly burdensome to the extent it calls for information or documents not within the possession, custody, or control of Defendant.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant has no responsive, relevant, non-privileged documents in its possession, custody, or control.</p>	<p>defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>
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